



February 5, 2009

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National Institute of  
Environmental Health Sciences  
NTP Interagency Center for the Evaluation  
of Alternative Toxicological Methods  
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Dr. Jerry Smrchek  
U.S. National Coordinator for the  
OECD Test Guidelines Program  
U.S. Environmental Protection Agency  
Ariel Rios Building, Mail Code 7403M  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Dr. Smrchek:

On behalf of the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM), thank you for the opportunity to review and comment on the latest draft OECD Test Guidelines (TGs), *The Isolated Bovine Corneal Opacity and Permeability (BCOP) Test Method for Identifying Ocular Corrosives and Severe Irritants*, and *The Isolated Chicken Eye (ICE) Test Method for Identifying Ocular Corrosives and Severe Irritants*. ICCVAM and the ICCVAM Ocular Toxicity Working Group enthusiastically endorse and support these much improved draft TGs and offer only minor editorial comments for consideration in the final versions.

As previously indicated, we believe that expeditious adoption of the BCOP and ICE Test Guidelines will have an immediate impact on the reduction and refinement of animal use for ocular toxicity testing. We appreciate the opportunity for the ICCVAM to provide comments on these revised draft TGs. Please feel free to contact us at any time if you have questions or concerns regarding these comments.

Sincerely,

/s/

William S. Stokes, D.V.M., D.A.C.L.A.M.  
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Enclosures

cc:  
ICCVAM Agency Representatives and OTWG Members